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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91182296
Party	Defendant Ucompass.com, Inc.
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Submission	Answer
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Date	03/17/2008
Attachments	Pld-Answer-Notice of Opposition.ENRICH.pdf (3 pages)(13773 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Application Serial No. 77/152652

ENRICH SOFTWARE CORP.)	Opposition No.: 91182296
)	
Opposer,)	Mark: ENRICH
v.)	
)	
UCOMPASS.COM, INC.)	
)	
Applicant.)	
)	
)	
)	

Applicant's Answer to Notice of Opposition

Ucompass.com, Inc. ("Applicant"), by and through its undersigned counsel, hereby files the following answer to the allegations contained in Enrich Software Corp.'s ("Opposer") Notice of Opposition Number 91182296 to Applicant's application for registration of the mark ENRICH with the United States Patent and Trademark Office.

In answer and response to the numbered paragraphs of Opposer's Notice of Opposition, Applicant states as follows:

1. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations contained in Paragraph 2 of the Notice of Opposition and on that basis denies the allegation.

2. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations contained in Paragraph 2 of the Notice of Opposition and on that basis denies the

allegation.

3. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations contained in Paragraph 3 of the Notice of Opposition and on that basis denies the allegation.

4. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations contained in Paragraph 4 of the Notice of Opposition and on that basis denies the allegation.

5. Admitted.

6. Applicant admits that its application was filed on April 10, 2007, based upon a first use at least as early as December 31, 2006 and a first use in commerce at least as early as February 19, 2007. As to the remaining allegations in this paragraph, Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations and on that basis denies the allegation

7. Denied.

8. Applicant admits that the mark it has applied for, ENRICH, is identical to the mark asserted by Opposer in this proceeding. All other allegations in this paragraph are denied.

9. Denied.

10. Denied.

11. Denied.

AFFIRMATIVE DEFENSES

1. Opposer has failed to state a claim upon which relief may be granted.

2. Opposer lacks standing to bring this action.

WHEREFORE, Applicant requests that the opposition be dismissed and that the application proceed to registration.

Respectfully submitted this 17th day of March, 2008.

PENNINGTON WILKINSON BELL
& DUNBAR, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent by electronic mail (ted.lienesch@thompsonhine.com) to Theodore D. Lienesch, Thompson Hine, LLP, PO Box 8801, Dayton, OH 45401-8801, this 17th day of March, 2008.

/William H. Hollimon/
William H. Hollimon